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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

KRISTIN K. MAYES - CHAIRMAN  
GARY PIERCE  
PAUL NEWMAN  
SANDRA D. KENNEDY  
BOB STUMP

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AZ CORP COMMISSION  
DOCKET CONTROL

IN THE MATTER OF THE JOINT NOTICE AND ). DOCKET NOS. T-01051B-10-0194  
APPLICATION OF QWEST CORPORATION, ) T-02811B-10-0194  
QWEST COMMUNICATIONS COMPANY, LLC, ) T-04190A-10-0194  
QWEST LD CORP., EMBARQ ) T-20443A-10-0194  
COMMUNICATIONS, INC. D/B/A CENTURY ) T-03555A-10-0194  
LINK COMMUNICATIONS, EMBARQ ) T-03902A-10-0194  
PAYPHONE SERVICES, INC. D/B/A )  
CENTURYLINK, AND CENTURYTEL )  
SOLUTIONS, LLC FOR APPROVAL OF THE )  
PROPOSED MERGER OF THEIR PARENT )  
CORPORATIONS QWEST COMMUNICATIONS )  
INTERNATIONAL INC. AND CENTURYTEL, )  
INC. )  
)  
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)

NOTICE OF FILING DIRECT TESTIMONY

Cox Arizona Telcom, L.L.C. hereby gives notice that it files the attached Surrebuttal  
Testimony of Kim Howell.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of November 2010.

ROSHKA DEWULF & PATTEN, PLC

Arizona Corporation Commission

DOCKETED

NOV 10 2010

DOCKETED BY

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BEFORE THE ARIZONA CORPORATION COMMISSION

**COMMISSIONERS**

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CORPORATIONS QWEST COMMUNICATIONS	)	
INTERNATIONAL INC. AND CENTURYTEL,	)	
INC.	)	

**SURREBUTTAL TESTIMONY**  
**OF**  
**KIM HOWELL**  
**ON BEHALF OF**  
**COX ARIZONA TELCOM, L.L.C.**

**NOVEMBER 10, 2010**

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1 **I. INTRODUCTION.**

2  
3 **Q. Please state your name and business address.**

4 **A.** My name is Kim Howell and my business address is 5775 Peachtree Dunwoody Road,  
5 Pavilion D, 6<sup>th</sup> floor, Atlanta, Georgia 30319.  
6

7 **Q. Are you the same Kim Howell who filed direct testimony?**

8 **A.** Yes I am.  
9

10 **Q. What is the purpose of your surrebuttal testimony?**

11 **A.** My Surrebuttal addresses: (i) Commission Staff's proposed conditions regarding the  
12 proposed merger and (ii) statements made by Joint Applicants in their Rebuttal It also  
13 discusses in more detail the difficulties Cox has been having with CenturyLink in Nevada  
14 related to CenturyLink's acquisition of Embarq.  
15

16 **Q. Could you provide an overview of your surrebuttal?**

17 **A.** Yes. Remarkably the Joint Applicants' position remains that the Commission approve the  
18 proposed merger without any conditions whatsoever.<sup>1</sup> However, Commission Staff has  
19 carefully considered the numerous implications of the proposed merger and has crafted a set  
20 of conditions designed to ensure that the proposed merger is in the public interest assuming it  
21 is approved. Cox appreciates the Commission Staff's recognition of the importance of  
22 maintaining competition in the Arizona market and ensuring that the merger will not result in  
23 any degradation of the current relationships between Qwest and the CLECs operating in  
24 Arizona. Fair and effective competition results in significant benefits for all Arizona  
25

26 <sup>1</sup> Hunsucker Rebuttal at 74:5-17.  
27

1 consumers and clearly is in the public interest.

2  
3 Cox supports the Commission Staff's conditions in general and urges the Commission to  
4 adopt those conditions. Cox believes that certain of Staff's conditions should be modified to  
5 provide better clarity and effectiveness and I discuss those modifications below.

6  
7 Finally, the Joint Applicants' rebuttal is full of generalized statements about their willingness  
8 to maintain the status quo and their ability to merge the two companies in a smooth transition  
9 that will not adversely affect CLECs, competition or the public. However, CenturyLink's  
10 acquisition of Embarq paints a much different picture. I will also discuss the difficulties that  
11 Cox has experienced over the past year with the CenturyLink/Embarq transition in Nevada.  
12 Staff's conditions and Cox's proposed conditions will help to ameliorate real life problems.  
13 Joint Applicants' vague assurances about their future plans will not.

14  
15 **II. STAFF CONDITIONS.**

16  
17 **Q. Please provide an overview of Cox's reaction to the Commission Staff's proposed**  
18 **conditions.**

19 **A.** Cox is encouraged by Staff's proposed conditions and believes that the conditions will  
20 facilitate continuing competition in Arizona and will assist in maintaining existing  
21 protections for CLEC to allow them to compete. The conditions benefit competition and  
22 consumers in numerous ways, including:

- 23 1. Maintaining Qwest wholesale performance at pre-merger levels, keeping Qwest's  
24 pre-merger OSS in place for three years, and ensuring the merged company  
25 continues to comply with the QPAP and PIDs.  
26 2. Confirming that Qwest remains an RBOC, subject to all 271 obligations.

3. Requiring 6 months notice on any OSS changes and requiring that Qwest demonstrate that any changes "will not result in degradation of current Qwest wholesale support systems."
4. Requiring that Qwest extend existing ICAs for 3-years after merger close.
5. Ensuring that there will be no discontinuance of intrastate wholesale services.
6. Prohibiting the imposition of new or additional charges on CLECs for functions already provided by Qwest.
7. Prohibiting the merged company from passing merger and transaction-related costs on to consumers and competitors.

These are just some of the main benefits of Staff's proposed conditions. However, it is important that the Commission consider the conditions as a coordinated package that is designed to achieve key public benefits, such as the maintenance of telecommunications competition in Arizona. Eliminating conditions could undermine the benefits that are intended from other conditions.

**Q. What specific Staff conditions are most important to Cox?**

**A.** As noted above, Cox believes that Staff's conditions taken as a whole are important to protect the public interest. However, from Cox's particular point of view, the following conditions are critical:

1. The Wholesale Operations conditions (Condition Nos. 19-33). Cox has some proposed clarifications and modifications to certain of those conditions which are discussed below;
2. Condition No. 4, which reflects Staff's foresight to ensure AZ consumers and competitors have the opportunity to receive the full benefit of all state commission and FCC conditions regarding the proposed merger;



1           3.       Condition Nos. 5 and 6, which will ensure that the Merged Company<sup>2</sup> honors its  
2                   ongoing obligations as a BOC and its attendant obligations under Section 271 of the  
3                   1996 Telecommunications Act.

4  
5       **Q.     Does Cox have any concerns with Staff's conditions?**

6       **A.**     Yes. Cox has several concerns. First, Staff's conditions regarding Qwest's OSS does not  
7                   have an express provision to provide for cooperative testing in advance of any changes to the  
8                   OSS. Given Staff's clear concern about ensuring the Merged Company maintains an OSS at  
9                   least as good as presently exists for Qwest, cooperative testing would be critical to ensuring  
10                  that any modifications do not degrade the OSS performance. Such cooperative testing may  
11                  be implicit in the Staff OSS-related conditions, but Cox believes it is important to expressly  
12                  provide for it. Participants in the testing process should have input on whether the  
13                  replacement OSS is sufficient. Condition No. 20 should include such an express provision.  
14                  Cox also believes that the conditions should ensure that any successor OSS is a suitable  
15                  replacement in practical terms. Therefore, the Commission should require that the  
16                  replacement include the same level of performance and functionality for CLECs, including an  
17                  electronic interface for support and flow through of orders.

18  
19               Second, Staff's Condition Nos. 25 and 30 should be clarified to ensure CLECs are provided  
20               with the ability to extend any existing Merged Company ICA and also to opt in to any  
21               approved ICA during its initial term *and during any extended term*. Those conditions only  
22               expressly provide that CLECs may extend their existing ICAs and that the existing ICA can  
23               be used as the basis for negotiating a replacement ICA. Even Joint Applicants appear to

24  
25               

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26               <sup>2</sup> "Merged Company" is used to refer to the merged parent companies, Qwest Communications  
27               International, Inc. and CenturyTel, Inc. and all of their regulated operating subsidiaries.

1 agree that they must provide CLECs the ability to opt in to ICAs, although they try to qualify  
2 the opt-in right temporally.<sup>3</sup> Clarity on opt in and extension rights is critical to avoid  
3 misinterpretation and confusion. Cox strongly believes that this Commission and others  
4 reviewing the merger should take the steps necessary to ensure competing carriers have  
5 access to stable, workable interconnection arrangements while the Merged Company  
6 integrates and implements its much heralded merger economies and efficiencies over the next  
7 several years. Unfortunately, the new and much larger Merged Company has an incentive  
8 and the means to aggressively force competitors into new, less attractive interconnection  
9 agreements throughout its footprint. This could result in anticompetitive changes unless  
10 competitors are provided with the certainty of extending and choosing from existing  
11 interconnection agreements and terms. Nationally, Cox advocates a merger condition  
12 requiring the Merged Company to allow requesting carriers to extend all ICAs throughout the  
13 Merged Company's footprint, and also advocates that competitors should have the  
14 opportunity to "port" agreements from state to state within the Merged Company footprint.  
15 There is clear precedent for such relief when large ILECs merge. AT&T and BellSouth  
16 agreed to such commitments voluntarily in their merger. State commissions and the FCC  
17 should act in concert to ensure these options are available throughout the Merged Company  
18 footprint. Therefore, Cox strongly supports Staff's proposed condition 4 which would permit  
19 this Commission to not only act aggressively in this docket to protect competitors and  
20 consumers in Arizona, but to also allow them to receive all of the benefits of merger  
21 conditions approved in other states and at the FCC.

22  
23 Third, many of the key conditions have a potential "out clause" that would allow the  
24 condition to be excused upon "approval of the Commission." This "out" clause creates a

---

25  
26 <sup>3</sup> Stewart Rebuttal at 36:13-18.

1 clear invitation for the Joint Applicants to continue to litigate the conditions – using up  
2 significant resources of the Commission and potentially affected parties – well after the  
3 merger closes. The Commission should seek to avoid such circumstances. If the ACC  
4 believes these are appropriate conditions, they should adopt them without reservation.  
5

6 **Q. Does Cox have any specific proposed modifications to Staff's conditions?**

7 Yes. Certain conditions could be clarified to be worded stronger and ensure less ambiguity  
8 should the merger be approved. In particular, Cox has proposed revisions to Staff  
9 Condition Nos. 19, 20 and 25 and would like some clarification (and possibly supplemental  
10 conditions) to Staff Condition Nos. 9 and 13  
11

12 **Q. Please explain your proposal with respect to Staff Condition No. 19.**

13 **A.** Condition No. 19 provides that the current Qwest OSS be kept intact for three years after  
14 the merger. This condition should include additional language to require parties to work  
15 cooperatively to test any OSS changes with the affected CLECs; the language “unless  
16 allowed by the Commission” should be stricken as this “out” clause creates the potential  
17 for ongoing litigation after the merger. Should this provision be kept in, then it should  
18 expressly require cooperative testing with CLECs as part of the Commission approval  
19 process. Any such change should be permitted only after thorough CLEC testing and  
20 approval as I discussed earlier, and the resultant OSS must provide the same level of  
21 performance and functionality.  
22

23 **Q. Please explain your proposal with respect to Condition No. 20.**

24 **A.** This condition addresses any integration of the Qwest OSS with the current  
25 CenturyLink/Embarq OSS. Notwithstanding our significant concerns with the integration  
26 process based on our experience in Nevada with the CenturyLink/Embarq integration (as I  
27

1 discuss below), this integration process should expressly involve CLEC cooperative testing  
2 sufficiently in advance of any planned changes – not just notice. As discussed above,  
3 cooperative testing is critical to make sure changes to the OSS actually work and do not harm  
4 service to CLECs and their end user customers. Condition No. 20 should include a provision  
5 that requires the Merged Company to provide a process for cooperative testing as part of any  
6 integration of OSS.

7  
8 **Q. Please explain your proposal with respect to Condition No. 25.**

9 **A.** Condition 25 requires the Merged Company to continue to honor all obligations under the  
10 current ICAs, tariffs and other contractual obligations to allow CLECs to extend ICAs  
11 pending new negotiations. Cox strongly supports this condition, but urges that it be  
12 clarified. This condition should expressly allow for an extension of ICAs for an additional  
13 term of three years at the CLEC's request and preclude the Merged Company from  
14 unilaterally terminating an existing ICA for three years after the merger closes. This  
15 provision should apply to ICAs even if their initial term has expired and they are in  
16 "evergreen" status. Such a requirement will allow CLECs some stability during the  
17 transition period after the merger. We would suggest adding the following provisions to  
18 Condition No. 25:

19  
20 For ICAs in their initial term: the ICAs may not be terminated or changed,  
21 with the exception of changes in law or triggering event expressly  
22 contemplated in the ICA, or unless requested and agreed by the requesting  
23 carrier, for three years from the ICA expiration date. Changes due to  
24 change in law or triggering events expressly contemplated in the  
25 agreement must be made according to the procedures set forth in the ICA.

26 For ICAs whose initial term has expired: the ICAs may not be terminated  
27 or changed, with the exception of changes in law or triggering event  
expressly contemplated in the ICA, or unless requested and agreed by the  
requesting carrier, for three years from the merger closing date. Changes

1 due to change in law or triggering events expressly contemplated in the  
2 agreement must be made according to the procedures set forth in the ICA.

3 **Q. What are your concerns about Staff Condition Nos. 9 and 13?**

4 **A.** Staff Condition Nos. 9 and 13 appear to contemplate that the new company will reorganize  
5 its ILEC operations, possibly with the intent of obtaining more rural subsidies. Although  
6 Staff's conditions address this concern to some extent, I believe an additional condition is  
7 appropriate. This new condition should prohibit the Merged Company and its subsidiaries  
8 from seeking a rural exemption for any Qwest ILEC service areas, either through  
9 reorganization, based on CenturyLink's status as a rural ILEC, or on any other basis. If the  
10 merger is consummated, CenturyLink will be the third largest carrier in the United States,  
11 serving numerous large metropolitan areas, and can no longer assert the rural carrier status.  
12 Bootstrapping CenturyLink's rural ILEC status into Arizona would be inappropriate. We  
13 would suggest an addition to these conditions that states:

14 The Merged Company will comply with the statutory obligations  
15 applicable to ILECs under Sections 251 and 252 in Arizona and will not  
16 assert the rural exemption or suspension under Section 251(f) based on its  
17 status in other states and will not seek to avoid any of its obligations on the  
18 grounds that it, or one of its operating companies, is exempt from any of  
the obligations pursuant to Section 251(f)(1) or Section 251(f)(2) of the  
Communications Act.

19 **Q. Are there any additional conditions that Cox believes would be appropriate in addition**  
20 **to Staff's conditions and the conditions Cox proposed in its Direct Testimony?**

21 **A.** Yes, I have several additional conditions that expand upon the concerns that other conditions  
22 are addressing. First, although I indicated in my Direct Testimony that Qwest should not be  
23 allowed to impose any charges on customer acquisition that Qwest does not charge today,  
24 that condition should be clarified to prohibit Qwest from seeking new tariff rates for -- or  
25 require the inclusion in interconnection agreements of -- any wholesale charges for service  
26 order processing (including but not limited to ASRs and LSRs), directory listings or

1 directory listing storage, non-published number charges, local number portability charges,  
2 E911 record transaction or storage charges, or NID access or use charges for three years  
3 from the date the merger closes. I believe this is what was intended by Staff Condition No.  
4 33 which would preclude "any new or additional charges upon CLECs for functions  
5 already undertaken by Qwest" without Commission approval. But further clarity would  
6 help avoid disputes over these types of charges. We would suggest adding a condition that  
7 states:

8  
9 The Merged Company shall not seek approval for new tariff rates or require  
10 the inclusion in interconnection agreements of any wholesale charges for  
11 service order processing (including but not limited to ASRs and LSRs),  
12 directory listings or directory listing storage, non-published number  
13 charges, local number portability charges, E911 recording transaction or  
14 storage charges, or NID access or use charges for 36 months from the date  
15 the merger closes.

16 Second, as I discussed above with respect to Staff Condition Nos. 25 and 30, there should  
17 be a condition that requires the Merged Company's operating entities to allow CLECs to  
18 "opt-in" to other approved ICAs, including during the period any ICA is extended pursuant  
19 to these conditions. Qwest will continue to have this obligation under Section 252(i) of the  
20 1996 Act, but clarification of this condition will limit potential for frustrating negotiations  
21 resulting in arbitrations which are time consuming and costly for carriers and the  
22 Commission. We would suggest an additional condition that states:

23 A requesting carrier may opt into any effective Merged Company  
24 interconnection agreement, whether negotiated or arbitrated, in its initial  
25 term or during any period it is extended for whatever reason, including but  
26 not limited to extensions granted pursuant to merger commitments.  
27 Adoption cannot be denied because the agreement has not been amended  
to reflect changes in law.

**III. OTHER CLEC CONDITIONS.**

**Q. What is Cox's position on the conditions proposed by other CLECs?**

**A.** Cox is supportive of the conditions proposed by other CLECS. Many of those proposed conditions address the same concerns that Cox has with the merger, such as the OSS. Those conditions also reveal that Cox is not the only CLEC with concerns about the proposed merger.

**Q. Why has Cox not proposed as many conditions as other CLECs?**

**A.** The other CLECs are much more dependent on Qwest UNEs. Unlike most other CLECs, Cox has its own network that it is using for telephone service. The dependency on UNEs leads to additional concerns and a need for additional conditions. That being said, Cox still has a significant interconnection relationship with Qwest that is critical to providing high quality service to its customers. Cox's proposed conditions primarily address that interconnection relationship and ensuring that it does not degrade as a result of the proposed merger.

**IV. RESPONSE TO COMMENTS ON HOWELL DIRECT TESTIMONY.**

**Q. Ms. Howell, could you provide a general response to Staff's and the Joint Applicants' response to your Direct Testimony**

**A.** Cox appreciates that Staff has acknowledged that Cox has real world experience in dealing with the fall out of a CenturyLink merger and the integration of two companies. I believe that Staff's proposed conditions reflect some of Cox's experience and concerns.

On the other hand, the Joint Applicants have not addressed my testimony or proposed conditions in any detail. Much of their testimony boils down to a bold request to “trust us” and a belief that no merger conditions are necessary to protect the public, including the competitive markets and the relatively effective interconnection relationship that finally exists between Qwest and other CLECs, including Cox. However, the current state of the Qwest/Cox relationship (and Qwest’s relationship with other CLECs) is the result of many years of conflict, litigation and Commission efforts. Cox is greatly concerned that the years of progress will be wiped out without appropriate merger conditions. Cox’s experience with the CenturyLink/Embarq merger reveals that a degradation of the interconnection relationship is a real possibility. Nothing in the Joint Applicants’ testimony does anything to assuage our concerns. In fact, their testimony heightens our concerns about the post-merger Qwest.

**Q. Is there any particular testimony that accentuates your concerns?**

**A.** Yes, the Joint Applicants’ discussion of the integration of the two companies. The witnesses discuss the integration in generalities and suggest that the CenturyLink/Embarq integration is going smoothly. For example, CenturyLink witness Todd Schafer at pages 9-10 of his Rebuttal Testimony states that the integration is going well and that their experience in integrating those two companies will result in a smooth integration of Qwest. Mr. Schafer does acknowledge that CenturyLink did have problems with the earlier phases of its integration, but suggests those problems are in the past. That is certainly not our recent experience in Nevada with respect to interconnection. Moreover, Mr Hunsucker argues at pages 58 of his Rebuttal Testimony that the CLECs have nothing but unsupported allegations that the CenturyLink OSS is inferior to Qwest’s OSS.

However, my Direct Testimony specifically identified Cox’s problems with the CenturyLink “EASE” – the new CenturyLink OSS. CenturyLink’s express and implied statements that



1 glitches with EASE are in the past and that its OSS is the equal of Qwest's OSS are simply  
2 wrong.

3  
4 **Q. Can you provide more detail on Cox's concerns with CenturyLink EASE?**

5 **A.** As I have indicated, the OSS that we are working with today with Qwest has been a good  
6 experience. I do believe that the Section 271 process -- and all of the Commission's efforts  
7 in that process -- have given us an excellent system. The Qwest OSS has also been  
8 improved over time and the CLECs are all very familiar with how to -- and are set up to --  
9 use that OSS. We had a similar experience with Embarq in Nevada prior to the merger in  
10 that the IRES system was far superior to the CenturyLink EASE. The integration of  
11 Embarq and the transition to the CenturyLink EASE OSS has been and continues to be  
12 problematic. Today in Nevada, the EASE system has negatively affected our response time  
13 for customer orders to switch phone service from CenturyLink to Cox. At times of high  
14 volume, our submitted orders will sometimes time-out, crash or experience other problems.  
15 We are frequently on the phone with CenturyLink representatives trying to recover orders  
16 that are lost in the transition. We continue to be frustrated with the inability to meet our  
17 customer's requests on a timely basis and be competitive with CenturyLink when our  
18 orders are lost in their operating system. We have found that in many cases we are having  
19 to call our customers back and push the installation date out as a result of the points of  
20 failure in the CenturyLink system. This creates particular problems when the customer is  
21 purchasing a bundle of services from Cox and may have to arrange for two separate  
22 installation appointments due to the delays.

23  
24 One of the key problems up front with the transition to EASE in Nevada was that Cox was  
25 not part of any testing of the system before it went live. As a result, over the last 11  
26 months, we have been working on rectifying all of the issues that should have been found

1 and corrected up front with cooperative testing. We are still working on that process which  
2 includes Cox management participating in weekly calls with CenturyLink staff. In many  
3 cases, during such calls Cox management must re-raise issues previously reported in  
4 trouble tickets to which CenturyLink has failed to respond. Many of CenturyLink's  
5 responses are vague in terms of what actions will be taken to address the problem and how  
6 they will fix it. Cox continually serves as a "feedback loop" for testing CenturyLink's  
7 broken process. I have attached as Exhibit KH-1 the Issues Log that CenturyLink has  
8 developed to address the problems with EASE in Nevada. CenturyLink is at least talking  
9 with us, but such discussions are not acted upon in any timely manner in that they have been  
10 very slow in executing solutions to the problems with EASE. In fact, the CenturyLink Issues  
11 Log has not decreased in any material way over the last 11 months. CenturyLink has re-  
12 formatted its issues list to make it look like issues have been resolved when in fact they are  
13 closing out issues that have not been resolved but CenturyLink has simply reclassified them  
14 and now considers fixing the issues to be an "enhancement." However, the problems persist  
15 and affect Cox's ability to serve its customers. Such continual delays in resolution of  
16 problems described in Exhibit KH-1 will ultimately impact competition in the Arizona  
17 market resulting in degradation of the current relationships between Qwest and the CLECs  
18 operating in Arizona.

19  
20 **Q. Do you agree with Mr. Hunsucker's assertion at page 10 of his Rebuttal that the EASE**  
21 **OSS is an automated system?**

22 **A.** No. Processing PDF files is not automation. The EASE system involves merely passing  
23 PDF files back and forth. Automation in the industry means the types of automated  
24 interfaces deployed by many providers, including AT&T, Verizon and Cox. These systems  
25 transfer order and provisioning data via an Electronic Data Interchange (EDI), which is an  
26 electronic system behind the scenes. As a result, Nevada is the only Cox market that has

not been able to take full advantage of our new automation tools for E911 and Directory Listing that have reduced processing times across all other markets. This is due to the absence of an EDI interface with CenturyLink.

**Q. What do you believe is an appropriate solution on the OSS issue?**

**A.** As I noted, Qwest has an effective OSS. There should be no reason to change that system – now or in three years. Staff’s conditions regarding the OSS – as modified by our proposals – are critical. CenturyLink’s EASE is simply an antiquated system that uses PDFs (i.e. real paperwork) as opposed to the Qwest EDI process. Ironically, Mr. Hunsucker states at page 59 of his Rebuttal that “in the longer run” post-merger CenturyLink is dedicated to having an industry leading OSS. However, he provides no time table for that event and it certainly is no justification for taking enormous steps backwards now with respect to Qwest’s OSS.

**Q. Does your experience with the CenturyLink/Embarq merger give you concern that this merger will draw resources away from Qwest’s wholesale operations?**

**A.** Yes. I am concerned with the impact to our customers when they try to resolve an issue in a timely manner. Based on our experience with CenturyLink, Cox may have to add additional resources to manage the workload if the Qwest OSS system is not kept in place.

**Q. At page 52 of his Rebuttal, Mr. Hunsucker asserts that you are equating payments for NIDs with customer acquisition charges. Do you agree?**

**A.** No. He misrepresents my testimony. If Cox uses a CenturyLink NID, it will pay for it. However, Cox should not be charged for disconnecting a customer premises wire from a CenturyLink NID in order to connect with that customer on the customer’s side of the NID.

1   **Q.   CenturyLink asserts in Mr. Hunsucker's Rebuttal (at page 52-53) that it should be able**  
2   **to charge an "administrative service order" charge every time it ports a number to a**  
3   **CLEC and that this is not a porting charge. Do you agree?**

4   **A.   CenturyLink is engaged in semantics and is proposing to apply a charge that neither Qwest**  
5   **nor any other major ILEC does. Mr. Hunsucker's testimony appears to confirm my fear that**  
6   **CenturyLink will push for additional charges on CLECs once it controls Qwest in Arizona.**

7  
8   **Q.   Does this conclude your testimony?**

9   **A.   Yes.**

EXHIBIT

KH-1

# Cox Operational Issues Log - Summary

Issue #	Description	Owner	Status	Date	Category
1	DA listings with omit address appearing in 411	Mike Norton	Closed	12/8/2009	EASE
2	Viewing FTP pon's in the GUI * partially completed on 1-30-10	Mike Norton	On going		Enhancement *
3	GUI slow response time	Mike Norton	On going		EASE
4	No acknowledgment is sent via FTP that an order was received	Mike Norton	Closed	8/19/2010	Enhancement *
5	Cox is not receiving Jeps via FTP	Mike Norton	Closed	11/30/2009	EASE
6	LNP orders not receiving responses via FTP after 12 hours	Mike Norton	Closed	12/2/2009	EASE
7	Directory Listings are stuck in FOC	Mike Norton	Closed	1/8/2010	EASE
8	No "wild card" for address validation	Mike Norton	Closed	12/2/2009	Future Enhancement *
9	Customer or address validation information is spread out - too much white space	Tonya Woods	On going		Enhancement *
10	No Default with the trading partner	Mike Norton	Closed	12/3/2009	Non-Issue
11	Remove case sensitivity	Mike Norton	Closed	12/1/2009	Future Enhancement *
12	We should be able to delete PONs from the list if they haven't been submitted	Mike Norton	Closed	12/10/2009	Training *
13	Cox needs an automated version of CSR for error reduction - UOM	Mike Norton	Open		Enhancement
14	Cox is receiving an FOC for an LNP order so they move forward with the SV create	Mike Norton	Closed	1/8/2010	Center Issue
15	Response times on Directory. On 11/24 Cox was receiving FOCs for 11/16 & 11/17	Mike Norton	Closed	12/17/2009	EASE
16	DD Sups (2) are being rejected	Christine Foo	Closed	1/8/2010	EASE
17	Files not being picked up timely by CTL	Norton/Foo	Closed	12/14/2009	EASE
18	Name Validation (1)	Norton/Foo	Closed	1/14/2010	Non-Issue
19	Name Validation (2)	Mike Norton	Closed	4/8/2010	EASE
20	911 Records	Mike Norton	Closed	12/11/2009	SPICE
21	Directory - OCN Field	Mike Norton	Closed	12/17/2009	Enhancement *
22	EASE Load Status	Christine Foo	Closed	1/27/2010	Training
23	Jepp Report Request	Mike Downey	Closed	3/17/2010	Enhancement *
24	Directory Orders - Sup 1 & Sup 2	Norton/Woods	On going		SUDS
25	Generic Errors in taps received by EASE	Mike Norton	Closed	1/22/2010	Enhancement
26	Inserting Main (LML) listings with Additional Listings (LAL)	Mike Norton	On going		SUDS
27	EASE CMBK Orders	Mike Norton	Open		Process
28	Unable to Use ADI field on Record Changes (ACT C)	Mike Norton	Closed	3/31/2010	EASE *
29	LNP orders not completed after activation by Cox	Norton/Downey	Open		Process
30	Commercial DL orders rejected in error for YPHV- all orders sent via FTP	Mike Norton	Closed	10/12/2010	Ensemble
31	Slower processing of DL orders. We have 1,002 DL orders in SENT status. Of those 504 were issued yesterday and should be completed by now.	Mike Norton	Closed	11/3/2010	Ensemble
32	DL orders completed are showing in PreOrder incorrectly without the listed name	Mike Downey	Open		Ensemble *
33	LNP orders showing provisioning complete but COX still receives an error and is not allowed to submit a listing because the Centurylink has not been removed	Mike Norton	Open		Ensemble

# Cox Operational Issues Log - Summary

Issue #	Description	Owner	Status	Date	Category
34	FTP DL orders ownership - Centurylink or Cox?	Mike Norton Mike Downey	Open		Ensemble
35	End user disconnected prior to port	Mike Norton Mike Downey	Closed	11/3/2010	Ensemble
36	Different File Format on Directory Proofs	Mike Downey	Open		Ensemble

\* indentifies that this function was available at one time to Cox (IRES)

# Cox Operational Issues Log - Open Issues

Issue #	Issue	Owner	Status	Remarks
13	<u>Cox needs an automated version of CSR for error reduction - UOM</u>	Mike Norton	Open	<p>12/02/09 Cox needs an automated version of CSR for error reduction - currently we do not have access to customers service records via FTP. each order has to be pulled one for one. Cox would like to have a way to request this information via a EDI connection. 12/14/09 This change would require CTL to adopt the UOM standards for LSR. The EASE product has that capability. This would require a project and it is not on the radar for 2010. We can revisit this in 2010. 12/17/09 CTL is moving forward to provide this enhancement. It must first be worked on the ASR side of EASE and then moved to LSR. ASR is expected in Mar/Apr 2009 time frame. LSR will be after that. 12/22/09 in progress 1/5/10 in progress 2/24/10 same 3/3/10 same 3/10/10 ASR is on track for April implementation. LSR is now being looked at. 3/17/10 LSR testing will begin soon. 3/24/10 same 3/31/10 same 4/7/10 this is expected to be completed in summer. 9/22/10 email sent to Cox to advise UOM is available and question if they wish to proceed. 10/26/10 conference call was held with Cox to discuss implementation of UOM. Design, testing and implementation can be done after the holidays. Cox will send CTL a list of questions.</p>
27	<u>EASE CMBK Orders</u>	Mike Norton	Open	<p>2/22/10 When filtering EASE by 215A Cox identified 443 pons issued by Centurylink to delete Cox listings. The pons are formatted as CMBKNPANXXXXXX. Some of the orders requested a DDD to match the port date (from Cox to Centurylink) or the same day issued. However all the orders are completing the same day they're issued and are removing Cox's listings. While Cox was reviewing their proof they found they had to resubmit listings that were deleted but never ported out to Centurylink. Cox provided examples and the EASE team is investigating. 2/24/10 This issue appears to be an internal process within CTL. Tonya hopes to hear back today with a status. 3/1/10 Cox continues to see listings being removed prior to the port date. Tonya has reviewed the correct process with the winback group. She will re-address with the operations group. 3/3/10 Cox is requesting what CTL's process is. Tonya was not able to be on the call, but an email has been sent to her. Also, because the listing is being removed by CTL prior to the port date, Cox is unable to issue a Change order on the account. 3/10/10 EASE team met with Comeback group and it appears to be a process issue. Mike will check further. 3/17/10 Mike met again with the Comeback team. They will not process directory orders until after the DD of order. The Comeback team was given the new instruction on 3/19/10. 3/25/10 Cox is still seeing this occur. The CMBK group has re-addressed with their Analysts. 3/31/10 Cox is still seeing some instances. 4/07/10 Cox is still seeing. They will send more examples. 4/21/10 Cox is still seeing instances of this happening. They will send new examples to Teresa. 4/30/10 Cox is still seeing orders. 5/14/10 Cox is seeing, but much smaller volumes. Will continue to watch. 6/3/10 Cox is still seeing a few here and there.</p>
29	<u>LNP orders not completed after activation by Cox</u>	Mike Norton Mike Downey	Open	<p>4/30/10 Cox is seeing LNP order that have been activated but have not completed in EASE. Since the order is not in completion status, Cox cannot issue the directory order or the 911 order. Mike Downey will investigate the examples that Cox provided. 5/14/10 As Cox sees these, they are sending to the NEAC to push to completion. They will continue this process. Teresa will monitor. 6/3/10 Cox is still seeing. If it is only 1 or 2, they call the NEAC, if more they send an email. 10/21/10 IT is working to change the status of the order to Provisioning Complete once the order is completed rather than after the billing tasks have been completed. Until the fix is in, CTL will run nightly scripts to push the status to provisioning complete. 10/27/10 The CASS release was put in last night. The scripting that was going to go through the conversion Pons, needs to be redone due to the conditions of some of the pons, (the quantity of tasks open or the type of tasks pending) They plan to rerun sometime in the next few days. 11/03/10 All defects except 1 (additional listings) has been resolved. When order gets to CASS, if it has additional tasks it will fall out to manually complete the CASS order. Fix for the additional listings is in testing. Cox agrees that #s have decreased, although they are still concerned over the age of some of the orders. Some are several weeks old. Cox would like to ensure the CTL is working the oldest ones first. Mike N. can create a report to identify the older ones. He will discuss with Mike D.</p>



32	DL orders completed are showing in PreOrder incorrectly without the listed name.	Mike Norton Mike Downey	Open	10/08/10 CTL is investigating this one with IT to determine when we can implement a fix. In the meantime, any inquiries for LTN can be sent to Vikki.A.Neset@centurylink.com and she will be happy to assist. Please do not send any other type of inquiries to this email address. 10/21/10 IT is working on code for a fix. 10/26/10 No fix yet. IT working on it. 11/03/10 Status is same. Cox continues to have issue, but they are using VCOLE as a work around. In process.
				10/12/10 In Ensemble once an order has manual intervention, the remaining steps of the order must also be treated manually. Ensemble does not provide any status back to EASE, therefore the analyst must do all steps manually. These orders are part of the orders that were processed right after the conversion and must now be completed manually. CTL is investigating the overall process and system flow. 10/21/10 IT is working to change the status of the order to Provisioning Complete once the order is completed rather than after the billing tasks have been completed. Until the fix is in, CTL will run nightly scripts to push the status to provisioning complete. 10/27/10 The CASS release was put in last night. The scripting that was going to go through the conversion Pons, needs to be redone due to the conditions of some of the pons, (the quantity of tasks open or the type of tasks pending) They plan to rerun sometime in the next few days. 11/03/10 Cox is still receiving errors. Mike N. asked if Cox could provide new examples that he could review. Cox will send.
33	LNP orders showing provisioning complete but COX still receives an error and is not allowed to submit a listing because the Centurylink has not been removed FTP DL orders ownership - Centurylink or Cox?	Mike Norton Mike Downey Mike Norton Mike Downey	Open Open	10/13/10 When Cox reviews a directory listing PreOrder they must be able to identify if the listing is owned by Cox or Centurylink. Previously Cox listings were indicated with an ALI code of AX followed by 2 numbers, Centurylink listings were noted with "LN". Now the ALI field results show; blank, 1, multiple numbers or L. Please review and advise what ALI format will be used for Cox and Centurylink listings. 10/21/10 This item is on IT's list of enhancements, no date has been given yet. 10/26/10 Design work and cost estimate and approval is being worked on. No estimate yet. 11/03/10 A change request has been submitted. We are waiting on prioritization.
34				
36	Different File Format on Directory Proofs	Mike Downey	Open	11/2/10 Cox requested a directory proof for Las Vegas. The file they received from RH Donnelly was in Excel format. The file use to be sent to Cox in text format. When Cox called RHD, they were told that is the way that CTL is now sending it to RHD. Cox was not notified of any changes and is requesting when the change occurred and why they were not notified. Teresa H. has a call into the NEAC to find out. 11/5/10 Since converting to Ensemble the file format is now as an Excel spreadsheet. A notification was not sent out to the CLECs for this change.

# Cox Operational Issues Log - Closed Issues

Issue #	Issue	Owner	Status	Remarks
1	DA listings with omit address appearing in 411	Mike Norton	Closed	12/01/09 CenturyLink identified that the ADI was not mapping correctly. Mike Norton is working with IT to get this corrected. We realize that Cox is very concerned and that at this point there are close to 700 listings that should be omitted and are in 411 with address information. As soon as we have a time line as to when this will be corrected I will communicate that to you. In addition I will work with Mike's team to determine how quickly the ones that are wrong can be fixed. 12/02/09 IT identified the root cause and a fix was put in place the night of 12/1/09. Christine is working to correct the points that were listed on the spreadsheet she received from Cox. We are also running a reports to identify all PONS in EASE that had the ADI field set to 0 and will compare to SUDS to ensure we don't miss any. 12/7/09 the 675 have been corrected in 411. EASE and Preorder. Work continues on the ones that were pulled from the report that CTL ran to identify all PONS that have been issued since EASE implemented. Mike's is waiting for an update from the directory group as to when corrections will be completed. Mike indicated that there is some latency with the corrections updating in 411. 12/8/09 Cox made a test call to 411 and the address was still being given out. Cox referred the issue to CTL. Christine and Mike did a test call on 12/8 (PM) and was not given the address. This information was communicated back to Cox on 12/9. 12/9/09 Cox made additional test calls and the address is still being given out by 411. Teresa H. made a test call and confirmed that the address is still being given out. CTL is checking with the vendor. The updates were communicated to CTL's vendor last week. 12/10/09 Mike reviewed samples and found the vendor had not updated their 127 feed until the night of 12/8. Cox will do more reviews and also provide some examples to CTL so that we can do some test calls as well. 12/14/09 Cox is still seeing omit address listings that 411 is still giving out the address. Teresa tested 5 listings this morning and all were ok. Cox provided 4 more and only 1 was correct. Cox will send more examples of orders prior to 11/30. Listed provided to CTL. 12/17/09 Overall this issue has been corrected. Cox still has about 30 that are still wrong. Cox provided a list of the 30 to CTL. 12/21/09 CTL responded to Cox that most of the 30 are not in CTL's system. 12/22/09 Cox provided Pons #s and CTL's Directory is now looking at them again. 1/7/10 the NEAC investigated the spreadsheet and could not find the PONS. A trouble ticket has been issued. Other than these this issue appears to be resolved. Once the backlog is current, Cox will order a while page proof and let CTL know if there are still issues. 1/14/10 status same. 1/19/10 status same. 1/27/10 Now that backlog is current, Cox can order proof to check and make sure this issue is resolved. Cox will order proof the first week of Feb. 2/4/10 Cox has received proof and is reviewing. 2/10/10 Cox is reviewing. Continued...see below
1	DA listings with omit address appearing in 411 (cont)	Mike Norton	Closed	2/17/10 Cox NV has reviewed the proof and it looks good. Orleans will check and see if they see any issues. If not we will close this issue. 2/24/10 no more issues, agreed to close. 3/11/10 Cox is still seeing instances where an Omit address is still appearing. Cox is populating ADI = 0. CTL investigated and found the orders were keyed incorrectly by the CTL analyst. 3/17/10 Cox sent another 50 examples which Mike N's team is investigating. 3/24/10 confirmed that the additional 50 were also Always error and not an EASE system issue. All were corrected on 3/24/10.
4	No acknowledgment is sent via FTP that an order was received	Mike Norton	Closed	12/01/09 EASE does not have an acknowledgment for receipt of an order. A pon will be rejected if an error is found on the front end and an FOC is sent on a correct Pon. 12/02/09 Cox is wondering how they will know if the FTP file is not received? Referred question to Mike. 12/10/09 Cox is waiting for CTL to share the times when files will be picked up. Ultimately Cox would like to receive some type of acknowledgement that the file was picked up. Cox would also like to know if there is a cut off time for receipt of a file. For example if the FTP is received after a certain time will the order due dates be pushed out? Christine will get with IT and report back. Christine has issued a change request to create the Acknowledgement Response for the FTP files/Pons when EASE receives them. 12/14/09 Christine provided times that FTP files are processed. Files are picked up every 5 min. They are processed internally every 2 minutes by Exchange Path. Files are picked up OCN by OCN. The process is systematic. There is no cut off time to the file. If the file is sent today the due date will not be pushed out. 12/17/09 No new date as to when the change request will be completed. 12/22/09 Tonya did not have an update. She will get one on 12/23/09. 12/23/09 A change request is being developed to add acknowledgement at receipt of the file from the customer. That will require several approvals in the process, costing and scheduling into an IT release. The project cost and estimate approval process will not be completed until mid-January. 1/5/10 Waiting on response from IT. This is not a simple change. 1/14/10 Requirements meeting held. IT is reviewing. Also included in this is an enhancement request to a code change in cancelled orders. 1/19/10 under review. 1/22/10 IT is working on it. 1/27/10 Change Request # 2128 has now been issued. Cost review is now being done. 02/03/10 IT Architect is working on an approach and cost estimate. No target date yet. 2/9/10 CTL has received a design and an estimate. Based on work in queue and the size of the project, a June or July target date is likely. 2/17/10 same 2/24/10 same 3/2/10 same 3/10/10 Target date is last week of July. 3/17/10 same 3/24/10 same 4/07/10 same 4/21/10 same
5	Cox is not receiving Jeps via FTP	Mike Norton	Closed	12/01/09 Fixed, CenturyLink identified that the response file sequence # did not contain enough characters. This was corrected on 1/30/09.
6	LNP orders not receiving responses via FTP after 12 hours	Mike Norton	Closed	12/02/09 This one can be worked with # 4 above. 1/5/10 team agreed to move to closed status.

# Cox Operational Issues Log - Closed Issues

Issue #	Issue	Owner	Status	Remarks
7	Directory Listings are stuck in FOC	Mike Norton	Closed	<p>12/01/09 Mike confirmed that we are not aware of any system issues that would create this and we have not received any concerns from other customers. Sometimes an error on the order will stop the order from flowing to completion status. If we could get a few examples, then I can get with the NEAC to investigate. 12/02/09 Cox will work on providing me examples. They are hesitant about giving examples because they want to ensure the problem is fixed and not just the exception. I explained that the problem could be errors on the order, but without examples I can not find out. I assured Cox that I would work with the NEAC and communicate the reasons for the delay and the fix to avoid delays in the future. I called Scott Nolan and left a message while I wait on the examples. 12/09/09 Christine resent the notifications to Cox. 12/9/09 Cox has not received them yet. 12/10/09 Christine will check with IT and find out why Cox did not receive the resend. Cox indicated that KS and FL did not have this issue until this week when EASE was down. Teresa has sent a request to the NEAC to find out how the process for moving these orders to completion status. 12/14/09 the resend of files did not reach Cox due to the system outages. There are still over 300 orders stuck. Mike &amp; Tonya are working with IT to get this resolved. It is first working on the other issues and hope to start on this one by 12/15. 12/15/09 the files were resent. 12/17/09 CTL's IT group identified the root cause for the delay in processing PONS. When a Pons enters EASE their is a process of checking many items to determine next activity. This is done in a 10 min period. However, due to the # of checks required all could not be done in 10 minutes. Then when the next check occurred, rather than start where it left off EASE was going back to the beginning. (train example). A new design was done and is expected to be put in 12/17. The change will enable the check to pick up where it left off. It will also be able to eliminate unnecessary stops. 12/22/09 fix is in place. Regarding the ones stuck. CTL is working on a fix to eliminate orders getting stuck. Testing is being done today and CTL should be able to implement within 24 hours after testing. Testing could last until midnight. For the backlog of orders, a script is being written that will complete the directory orders without manual activity. Tonya will provide an update on 12/23. Continued (See next line below)</p>
7	Directory Listings are stuck in FOC (cont)	Mike Norton	Closed	<p>12/23/09 The NEAC has a large backlog of Directory orders that have fallen to a manual queue for review. IT will be running a script that will automate about ten percent of these where we managed to automate an error check that used to be manual. The remaining orders have to be reviewed and a spot check today did indicate that there were a number of PONS that had errors on the order that will require correction by the customer. We are getting more detailed reports tomorrow that will help us determine if we can create additional scripts to correct some of those errors to reduce the need for customer clarification. 12/24/09 Mike D. and Mike N. are working on the script to help mechanize the clean up of the back log. The NEAC has also put measures in place regarding staffing to address the back log. The NEAC staff will be working 9 hour days and Saturdays. In addition, more resources in the form of contractors are being brought on. 1/5/10 An RCA discovered two issues, 1 - the interface between EASE and SUDS for changes was submitting 2 orders (out/in), however, directory only orders wanted 1 order. System was then sending these orders to be manually worked, thus creating the backlog. The fix for this was put in place the night of 1/4/10. 2 - there was missing or bad data on order. CTL team worked to identify primary errors and bus rules were put in place also on the night of Jan 4. CTL will send a list of those fixes to Cox. List was sent on Jan 6. continued see below</p>
7	Directory Listings are stuck in FOC (cont)	Mike Norton	Closed	<p>1/8/10 Due to EASE enhancements, orders are now processing quicker. Edits continue to be put in place that will ensure errors do not occur downstream that have caused delays in processing orders. Changes on 1/7 pushed FOC task behind Directory System update task. This may increase the FOC time. Any order that has errors will not be FOC'd. This should make the orders more manageable. Cox will not be sent the FOC until the order can be worked. The order will stay in "sent" status. Cox questioned how long they should wait before calling to check - 24 to 48 hours. Backlog continues to be decreasing, however CTL could not provide a date as to when it will be current. 1/14/10 Backlog is being worked on. NEAC has two analysts dedicated to work. Lots of investigation in several systems is required. Work will continue. Cox is still seeing some Dec and early Jan orders still in confirmed status. Samantha will send list to CTL. 1/19/10 Backlog is decreasing. Cox would like CTL to use their list to cancel the ones indicated. CTL is concerned that without investigation an error could occur. Cox is concerned that due to the age, there may be orders placed since the backlog that negate the original request. CTL will use Cox's list to look first at the cancels. 1/22/10 Backlog is decreasing. CTL tried to use list Cox provided, but due to Pons being in various stages it was more time consuming. Cox is seeing some improvements, but still have 12 orders from 12/30. Added OCN 1802 and 7193 to the two analysts that have been designated to work on 215A. continued see below 1/27/10 Backlog is now current. Oldest date is 1/15 &amp; 1/20. 50 directory orders are in confirmed status. Cox agrees. This issue appears to be resolved. Keep on report for 1 more week to make sure. 2/4/10 Cox is seeing about a 4 day lag time. They would like to see a 24 hour response. EASE should be processing simple DA &amp; ports right away. If manual order, then about 1.5 days. The NEAC has a team looking at to ensure no lag time is occurring. 2/10/10 Cox is seeing a backlog from 2/9. CTL does not see it. Mike D. Will get with EASE team and then Cox team to ensure they are all looking at same thing. ....continued see below</p>

# Cox Operational Issues Log - Closed Issues

Issue #	Issue	Owner	Status	Remarks
7	Directory Listings are stuck in FOC (cont)	Mike Norton	Closed	2/17/10 Cox is seeing about 200 orders that and in confirmed status from 2/1 through 2/12. Mike D. team continues to review all Pons that have not moved to completion. In most cases the orders have been worked. 2/24/10 This issue has been obscured by the x-visibility enhancement being in the FTP pons into VFO. CTL is seeing about 5% of Pons for all CLECs falling into a manual queue to be investigated. CTL is FOCing 93% to 95% of all pons within 24 hours. 3/31/10 CTL receives hourly reports to monitor the flow of the Pons. If a Pon is not moving to the next step, it is identified and investigated. CTL did experience a mapping issue on 3/1. An updated was made which resulted in corrupting orders flowing from VFO to orchestrator. The orders were not able to map. The affected orders were identified and fixed by IT. During call Mike N. pulled a report for current orders that were not flowing, and saw it may be a little high. He will check further. 3/10/10 SUDS issue this week created an increase in orders that did not move to completion. The fix was put in place on 3/9. Orders will be re-processed on 3/10. Cox will run a report on 3/11 and send to Mike N. for review. 3/17/10 Cox is still seeing several orders not moving to completion. Mike N. requested a new list to review. 3/24/10 Cox has seen a decrease in orders that are still open. CTL saw a decrease of about 25% over the past weekend. FTP processing was a problem on 3/23 and IT is working to complete orders that were dd for 3/23. 3/31/10 CTL is showing 66 as of this morning. Most are under 48 hours old. 4/7/10 Improvement continues. 4/21/10 same
8	No "wild card" for address validation	Mike Norton	Closed	12/01/09 EASE does not have a wild card for address validation. The information is pulled from other systems (SIG and Wilserve) that do not recognize the "wild card". However, a work around would be to use the pre-order screen and populate minimal information. That way alternatives will be returned as possibilities. 12/02/09 Cox is saying that when they use minimal inputs, EASE does not recognize where the address error is. If EASE where to identify that the address direction, # or spelling was wrong, it would help them identify the correct address. I will pass this on to Mike as possible enhancements. 12/10/09 Cox passed on that the EASE does not recognize if the address is not a CTL served address as the IRES address validation did.
10	No Default with the trading partner	Mike Norton	Closed	12/01/09 we can add this to our customer request for enhancements. In the meantime are your teams using the template functionality? 12/02/09 Cox is using the templates, but they were wondering why there isn't a default since the only choice is Embark. If we could just add to the enhancement list. 12/03/09 As we integrate CenturyTel companies into CenturyLink, there will be more choices than just Embark.
11	Remove case sensitivity	Mike Norton	Closed	12/01/09 This is part of the program. We will add to the customer request for enhancements list
12	We should be able to delete PONs from the list if they haven't been submitted	Mike Norton	Closed	12/01/09 Mike will need to check on this one. 12/10/09 Tonya gave instructions on how to void a PON, however, the issue is that if Cox determines they want to void a Pon, they want to be able to reuse that same Pon # is the 1st order is voided. For instance if Cox submits an order and there are errors, they void the Pon, then they are unable to reuse the same Pon #. Tonya confirmed that once the order is submitted the Pon # is associated with the CLEC and cannot be reused. Christine/Tonya will check and see if this can be bypassed in any way. Cox also mentioned that they were not able to cancel a Pon after it was submitted. They will send an example. 12/14/09 Now that Cox is familiar with the void function, this one is ok to close. Mike also reminded Cox that if they need to change an order they can do so by modifying the order.
13	Cox needs an automated version of CSR for error reduction	Mike Norton	Closed	12/02/09 Cox needs an automated version of CSR for error reduction - currently we do not have access to customers service records via FTP. each order has to be pulled one for one. Cox would like to have a way to request this information via a EDI connection. 12/14/09 This change would require CTL to adopt the UOM standards for LSR. The EASE product has that capability. This would require a project and it is not on the radar for 2010. We can revisit this in 2010. 12/17/09 CTL is moving forward to provide this enhancement. It must first be worked on the ASR side of EASE and then moved to LSR. ASR is expected in Mar/Apr 2009 time frame. LSR will be after that. 12/22/09 in progress 1/5/10 in progress 2/24/10 same 3/31/10 same 3/10/10 ASR is on track for April implementation. LSR is now being looked at. 3/17/10 LSR testing will begin soon. 3/24/10 same 3/31/10 same 4/7/10 this is expected to be completed in summer. 9/22/10 email sent to Cox to advise UOM is available and question if they wish to proceed.

# Cox Operational Issues Log - Closed Issues

Issue #	Issue	Owner	Status	Remarks
14	Cox is receiving an FOC for an LNP order so they move forward with the SV create	Mike Norton	Closed	12/02/09 Cox is receiving an FOC for an LNP order so they move forward with the SV create - Cox does not agree with receiving a jeps after we have FOC. If we have FOC we continue on with the port request and create our subscription at the NPAC. 12/10/09 Cox is receiving jeps after FOC is provided. An example is a jep on LNP signalling. Cox fees this should be a reject not a jep. The industry considers this an error. 12/14/09 CTL is systematically looking at adding edits before the FOC so we minimize the orders that get to downstream apps after the FOC and get rejected. 12/17/09 CTL has a change scheduled for the night of 12/17. This change will push out 2 steps later for an FOC to be sent. This will reduce errors/jeps after FOC. 12/22/09 fix is in place. Cox is now seeing error codes without an explanation. They are preparing an email to send to Teresa. Teresa will refer to Mike N. and Tonya once it is received. 12/24/09 Cox provided examples and CTL is reviewing. 1/8/10 Cox provided an example on the call of Pon # 4764547406A. After review it was determined that an analyst incorrectly completed the task. 1/14/10 no new issues. Closing.
15	Response times on Directory. On 11/24 Cox was receiving FOCs for 11/16 & 11/17	Mike Norton	Closed	12/02/09 Still an issue. These are orders that are submitted today, due today. EASE is pushing the dd out by 1 day. 12/10/09 Orders are still being pushed out at least 1 day and in some instances up to 3 days. 12/10/09 CTL is in the process of modifying the due date to return the current date for Directory Listings (req type J) orders only. We do not have a completion date yet. 12/17/09 CTL's IT group identified the root cause for the delay in processing PONs. When a Pon enters EASE there is a process of checking many items to determine next activity. This is done in a 10 min period. However, due to the # of checks required all could not be done in 10 minutes. Then when the next check occurred, rather than start where it left off EASE was going back to the beginning. (train example). A new design was done and is expected to be put in 12/17. The change will enable the check to pick up where it left off. It will also be able to eliminate unnecessary stops. (same as # 7) 12/22/09 see update on # 7. 1/14/10 comments being posted under # 7 - close.
16	DD Sups (2) are being rejected	Christine Foo	closed	12/3/2009 All Cox's DD supplements (SUP(2)) are being rejected, reason 01 was FOCed (RT(ES)) first. Subsequently we sent a supplement for a Due Date change in which we incremented the version and provided the new due date. Cox received an Error response (rejection) stating that sup 2 requires change in values for ver and didd even though our supp request actually had a change in those fields. Even more puzzling piece to this is the remaining phrase in the message that states ALL OTHER FIELDS ARE PROHIBITED? Sup 1 (Cancelled) request is accepted with the same file format. And so is Sup 3 (Other) 12/5/09 Mike indicated that CTL expects a patch from the vendor and that the Supp 3 work around is temporary. The patch should be received by 12/8/09 and then tested and implemented the weekend of Dec 12. Christine informed Cox that even though the Supp 3 orders are rejected, the CTL DBO team is manually working them. Cox was not aware of this and needs to know when the orders are worked so that they can update the dd in their systems. Christine provided the email and tel # of the DBO team that works these orders. Cox can contact them to check order status. The telephone # is 1-800-578-2279 opt # 4 (for LNP). the email address is DBO-Request@centurylink.com. The 800 # is manned Mon - Fri 7am to 7pm (CST) and Sat 7am to 3:30 (CST) 12/7/09 Mike shared that the Supp 2 patch should be in place by the evening of 12/8 and Cox will be able to use by 12/9. There will be no delay for testing. Viki indicated that Cox had contacted DBO and they were unable to view the LSR and could offer no assistance to Cox. Christine advised that Cox should contact the NEAC with questions about orders because DBO can only provide information on the status of porting. 12/10/09 This appears to be working now. Teresa will confirm with Mike that fix went in ok. Mike confirmed that this has been fixed. 1/5/10 Moved issue back to open. Cox may still be having concerns on this one. 1/8/10 The SUP2 fix was put into production last night and should alleviate the Sup 2 issue on all new orders keyed in on 1/8 and beyond. 1/14/10 fix was done on 1/8 and Cox is not seeing any issues since that date. Keep issue open for 1 more meeting. 1/19/10 closed.
17	Files not being picked up timely by CTL	Mike Norton Christine Foo	Closed	12/3/09 Cox is noticing that files placed to CTL are not being picked up timely. On 12/2/09 Cox uploaded orders at 8:45 am (EST). Several hours later, CTL had still not picked up the orders. Cox contacted CTL and the file was picked up at 5:45 pm (EST). Christine advised there was a "blitch" which lead to the orders not being picked up. Mike will work with Christine on this. 12/7/09 Christine and Mike, do to other issues, have not had an opportunity to discuss this yet. They will provide an update on our next call. 12/10/09 Need update from CTL. 12/14/09 This was due to outages. This should not be an issue now. 12/17/09 no issues for now. 12/22/09 It appears no issues right now, however, until the other issues regarding responses are resolved we will not know. 1/14/10 Cox is not seeing any issues. Closing

# Cox Operational Issues Log - Closed Issues

Issue #	Issue	Owner	Status	Remarks
18	Name Validation (1)	Mike Norton Christine Foo	Closed	12/2/09 Christine stated that CTL needed to validate on name in case it was a multi-location customer. Cox responded that it would be appropriate to validate on # not name. Mike and Christine will work on getting more information on this item. 12/7/09 Mike and Christine have not had a chance to discuss whether the delete parameters should be changed so that EASE validates based on telephone number instead of name. 12/15/09 CTL validates on # first and then name. This ensures we do not make a change to a line incorrectly in the event a TN is mis-keyed. The less info we validate against the higher the risk of making a mistake. 12/17/09 Cox understands CTL's reason for the edit, but feels that if they make a mistake and disconnect a customer that is on their side. Mike N. will check internally to see if this edit can be relaxed. 12/22/09 This request is being looked at. CTL needs to determine the impact this change would create for all CLECs. 1/14/10 After careful review and comments from other CLECs CTL has decided to keep the edit as is. Some CLECs, like Cox in are ok with CTL removing this edit, but other CLECs wish to keep the edit. As long as there are some CLECs that wish to keep the edit, CTL cannot remove the edit for Cox. We will keep this issue open for 1 more meeting. 1/19/10 closed.
19	Name Validation (2)	Mike Norton Christine Foo	Closed	12/7/09 Viki also raised an issue where in addition to validating problems with initials, names with numbers in them are being accepted/completed in EASE, then being rejected downstream by the directory team at CTL because the Place Listing As (PLA) field is not complete, however Cox did populate this field. Christine will review this. 12/14/09 CTL is in the process of modifying the Name value with initials. The business rule has been created and tested. We hope to deploy this week by 12/16. 12/17/09 The initials issued is now fixed. The PLA issues is still open. The trouble is one of the top 10 that IT will be working. Christine has escalated it internally. 12/22/09 Tonya will provide an update on 12/23. 1/14/10 Christine will need to check on this one. 1/19/10 testing being done. 12/21/10 ticket had to be reopened. Christine is working on this. 12/7/10 Trouble shooting is being done. New code is also being tested with the trouble shooting. 2/4/10 IT group is working on. 2/09/10 SUDS IT team is troubleshooting the issue. 02/17/10 same. 2/24/10 IT has identified that certain fields are being overlaid when a required order is being created. They are working on identifying what is causing this to happen. 3/5/10 The cause as not been identified. IT has put some more intrusive diagnostics into the code to troubleshoot the issue. 3/10/10 Orders are flowing to SUDS. Identified during a test that one of the fields is not populated in the SUDS/TEST. EASE IT is checking with the SUDS IT team. 3/17/10 order is being created correctly in SUDS & SOE, just not porting correctly. More testing is being done. 3/24/10 testing has been successful and the fix will be put in place during maintenance window on April 1. 3/31/10 This is scheduled for April 10. 4/7/10 This will be deployed on Thursday (4/8) night and be available on Friday (4/9). 4/15/10 confirmed fix did go in on 4/8. 4/21/10 Cox is not seeing any issues. Close issue
20	911 Records	Mike Norton	closed	12/10/09 As we've mentioned, since transitioning to EASE there are delays in receiving completion records for our LNP orders. This in turn has increased the number of 911 errors we receive on a daily basis from 40 per day to over 100 per day (more than doubling). The error specifically is that after we receive FOC and activate the order in the NPAC, Centurlink is not completing the order in a timely manner and therefore the 911 record is not unlocked. Because it is not unlocked, we cannot update the record. Therefore if the customer has moved at the same time that they've transferred service to Cox from Centurlink, the PSAP will not have the customer's new address information. This obviously is a grave concern and tremendous safety risk. 12/11/09 CTL confirmed that this is not an EASE issue. A back office system release unrelated to either Wholesale or EASE took place over the weekend. We identified yesterday (12/10/09) that this release caused SOE orders to not be updated correctly and therefore not complete, this inadvertently caused the EASE order to not complete as well. The problem started on 12/7. A fix has been created and was tested yesterday and will be put in tonight (12/11). CTL is manually correcting the orders and Cox has provided a report of those numbers that need to be unlocked. 12/14/09 Fix went in on 12/11. Vendor worked on order over the weekend and all should now be completed. Cox is seeing 911 records going through fine. 12/17/09 Cox is not having any issues with this item. We will close this issue.
21	Directory - OCN Field	Dallas James Tracy Rodebush	Closed	12/10/2009 Cox was questioning the status of relaxing the OCN field. Aimee with Cox had been speaking to Tracy at the NEAC about this issue. Teresa will follow up and get an update. 12/17/09 The OCN field has been relaxed. We will close this issue.

# Cox Operational Issues Log - Closed Issues

Issue #	Issue	Owner	Status	Remarks
22	EASE Load Status	Christine Foo	Closed	12/10/09 Cox for OCN 1802 & 7193. When they pull up the status, they are only seeing the Las Vegas OCN (215A), however when they pull up the order is shows the correct order. Need to have someone look at this. 12/15/09 Mike questioned if Cox has a filter set up on this? 1/5/10 This may or not be an issue. Cox sent an email on 1/5 asking CTL to ensure that listings for FL or KS were not appearing on the NV ban. Email was sent to Mike N's team to investigate. 1/15/10 A conference call was held between Cox and CTL. Erin demonstrated the issue to Christine. 3 items were identified that need to be researched by CTL. 1. Why is the CCNA on the Responses showing the Parent (215A) and not the OCN that the PON was submitted. 2. determine who sent the report, when and why the report is listing all service order activity under 215A. 3. verify that the 3 OCN #s (215A, 1802, 7193) are billing on separate bans by state. 1/18/10 Christine confirmed the CCNA on the Responses will always be the ESP's CCNA, and not the OCN. In this case, the ESP's CCNA for OCN 1802 and 7193 is 215A. Also verified Dec invoice and did not find any billing of FL or KS on the NV ban. CTL will check again on the Jan invoices. 1/19/10 a conference call is being set up for Jan 25 to discuss options for Cox to create separate parent OCNs. 1/22/10 conference call still on for 1/25. 1/27/10 conference call was held on 1/25. Tonya advised Cox that she could separate each code to be a parent. However, the history would not be available. Cox's biggest concern is the billing remain separate for the three OCNs. CTL has verified the Dec bills and the billing is separate. Teresa is working on validating the Jan bills. Once this has been done, a new meeting will be scheduled to go over the results. 2/4/10 Teresa is still reviewing bills and so far has not found any instances of X-billing of states. Due to a Bill Cycle change in Jan, the review is moving slowly. Cox did say that as long as billing is not mixed by state, then it will be ok to keep OCNs as is. 2/10/10 Review is complete and no cross billing occurring. Ok to close
23	Jepp Report Request	Mike Downey (NEAC)	Closed	12/14/09 Cox receives a Jpp, Reject and No Fac report out of IRES today. They are requesting the same report out of EASE. 12/15/09 CTL is working to create a report. 12/17/09 Mike Downey's team is working on this report request. There are still some items that need to be worked out before we have a good report that we can share. 12/22/09 CTL is working on report. An internal meeting is being held today. Teresa will provide an update on 12/23. 1/4/10 Mike D. will check on this one. 1/19/10 report is still being worked on. May not be able to create in EASE the report that CTL provided in IRES. 1/22/10 Mike D. and team is working on report. 1/27/10 The report is close to being done enough to present to Cox. Right now CTL is separating by state. 2/4/10 Report is close to being done. 2/10/10 working on. 2/17/10 same. 2/24/10 Draft report should be ready by this afternoon. 2/25/10 Draft report sent to Cox team for comments. 3/2/10 Cox provided comments back and CTL is working on those suggested changes. 3/10/10 a revised report was sent to Cox for comments. 3/17/10 Cox accepted report. CTL is now sending daily to Cox. Close issue? 3/24/10 ok to close
25	Generic Errors in taps received by EASE	Mike Norton	Closed	1/19/10 Cox is receiving generic errors on their orders. They first saw this in late Dec 2009. Cox is looking for more specific codes to help them identify the jpp reason. This is forcing them to call the NEAC for more information. Cox thinks a fix of some type was put in about a week ago, but they are still seeing. 1/20/10 Cox provided examples. 1/21/10 ticket E389373 opened for this issue. CTL will be deploying a rule change on Friday evening 1/22/10 and it will be available on 1/23/10, which will also resolve this issue. 1/27/10 Rule was deployed on 1/27/10. Cox is not seeing any issues at this time. Keep issue open for 1 more week. 2/4/10 Cox is seeing the generic description, but they are also seeing additional information on the reason text. Christine is working on putting further description in the remarks section. 2/9/10 Testing completed and it will be targeted for implementation this week. We will be copying the Rdealt message and placing it to the Remarks fields in the FTP/Response file. 2/17/10 This was deployed on 2/12. 2/17/10 Orleans is seeing the remarks. Heather will also check. Close issue on next call if no more issues. 02/24/10 No more issues, agreed to close.
28	Unable to Use ADI field on Record Changes (ACT C)	Tonya Woods Christine Foo	Closed	3/3/10 Cox is unable to send a record changes on a listings changing from published to name only. They receive an error message, "ADI is not valid when LACT=O", "D", "Z". Tonya responded back to Erin, however, additional questions were brought up. Christine tried to address during call, but agreed to work with Erin off line. 3/8/10 Christine is investigating why this error is occurring. 3/10/10 Issue has been sent to the Rules team to investigate. 3/17/10 Christine will be meeting with Tonya next week to determine a course of action. 3/24/10 The business rule has been updated and is in testing now. 3/31/10 Fix is in production. Worked on 3/26. Cox was not aware it was fixed. They will provide an update next week. 4/7/10 Cox will test and provide an update. 4/21/10 Cox is not seeing any issues. Ok to Close

## Cox Operational Issues Log - On Going

Issue #	Issue	Owner	Status	Remarks
2	Viewing FTP pon's in the GUI	Mike Norton	On going	<p>12/07/09 EASE does not have the ability to view in GUI if request was sent FTP. This is the same in EASE ASR and LSR. Since this is not a defect of the EASE system, an enhancement would be required to create this function. Unfortunately due to the cost, an enhancement is not planned at this time. 12/3/09 Cox is very concerned with CTL's position. Although during design of EASE, the customers that CTL asked did not feel a need for this, Cox does feel it is necessary and were concerned that their input was never requested. Cox argues that EASE is supposed to be an improved tool, however, without order visibility, it is a giant step backward for Cox. Mike and Teresa will work together and see if movement at the executive level can be made. 12/7/09 Mike met with the Director of Wholesale Operations and explained Cox's position regarding order visibility. Based on the additional information, Mike has been authorized to obtain a cost estimate from the vendor to create an enhancement for this functionality. If the cost is reasonable, then CTL will be able to move forward and on the enhancement. 12/10/09 Mike had to drop from the call. Teresa shared that he has met with the vendor, but she did not have any other information. Mike will provide update on our next call. 12/14/09 Mike advised that CTL is moving forward on this change and will cover the funding of the enhancement to EASE. Normally a change of this magnitude takes 180 days, however CTL has requested expedite. Testing should take place the first weekend of Jan 2010. CTL hopes to implement sometime in Jan 2010. In addition to view, the enhancement will also give the ability to update. 12/17/09 this is still on track. 12/22/09 still on track. 1/5/10 Testing is complete. Will begin beta test with Cox week of Jan 11. Samantha Walker and Heather Schon will be contact points at Cox for 215A. Christine Foo will contact them to begin testing. 1/11/10 1st meeting with Cox. Continued...see below</p>
2	Viewing FTP pon's in the GUI (Cont)	Mike Norton	On going	<p>1/14/10 Code is being worked on based on Cox's comments from 1/11 call. Cox is also asking for a list of the 5 fatal errors that will not be seen. Christine has sent a request to IT for them. Christine is working on errors that cannot be seen in VFO. ID# orders will not be there. The system will need enhancements for this function. The SOE order # cannot be seen in EASE. Cox can use the Pon # or tel # as a reference 1/19/10 Christine will provide update on next call. 1/22/10 testing identified 1 defect. On target for end of January. 1/27/10 Will implement the weekend of 1/30. Christine will get with Cox on Monday, Feb 1. As a reminder, if and FTP Pon has a hard reject, Cox will not be able to view in VFO. This type of reject is communicated by email to Cox (Navarow &amp; Babu). 2/2/10 Conference call was held to view the x-visibility enhancement. Cox is now able to view in VFO any orders submitted via FTP as of 2/1 and have not received an error. The enhancement is not fully what Cox expected. They are still not able to view orders with errors. This creates a huge concern for Cox. Christine was not sure when the error feature would be enhanced, but she will discuss with Mike Norton. Cox also provided a pon they were not seeing, Christine will also research that issue. Continued...see below</p>



## Cox Operational Issues Log - On Going

Issue #	Issue	Owner	Status	Remarks
2	Viewing FTP pon's in the GUI (Cont)	Mike Norton	On going	<p>2/4/10 Cox is seeing LNP orders with errors. Tonya will look and see why. CTL did not expect this outcome. Cox would still like to see all errors. 2/9/10 Christine reviewed this the other day and found that if the PONS error in ORCH they are viewable via VFO by Cox. These are normally errors that the NEAC will resolve. If the PONS error in Exchange Path (gateway) they are not viewable via VFO by Cox as the system does not recognize this as a good order yet. Normal flow is VFO to EP to ORCH.</p> <p>2/10/10 Cox is not able to view errors they were able to see on the first couple of days. Cox will only be able to view errors that are in CTL systems. A Fatal error they will not be seen. CTL realizes that Cox wants to see all errors and will look to see what can be done. 2/17/10 Cox is unable to see Directory Pons submitted via FTP as of Feb 8th. Tania provided a few examples to Christine to look at. 02/24/10 Cox is seeing a large number of FTP orders from 2/8 through 2/16. Still in Beta testing with this new x-visibility function. Currently working to address that the date on the received record on FTP Pons that is not populating in VFO. This issue does not affect the actual order, just the view in VFO. Mike N. will update with email when resolved. 3/3/10 Testing continues. Status is now current on viewing Pons. Cox is concerned that the full functionality they had in RES is not ready yet in EASE. Specifically the ability to view all levels of errors. 3/10/10 Goal is to get enhancement working as designed by end of March. There are a couple of defects being worked on. Other enhancements are being evaluated for costing and timeline. IT is looking at it now. 3/17/10 A vendor patch is in testing for a 3/26 implementation date. Fix will update status correctly and fix the send record side data applied. After fix will be able to use from and to dates on filters. 3/24/10 First fix to correct the send record side was put in place early this week. Orders can now search by day. The second fix which is to update the status is scheduled to be tested on 3/29. 3/31/10 Tonya will check 4/7/10. Tonya is checking 4/15/10 Second fix for status was completed on 3/30. The only remaining items is the ability for Cox to correct errors. Cox's requests for enhancement are on an overall list for enhancements, however, due to resources, CTL is not sure when the enhancements can be worked.</p>
3	GUI slow response time	Mike Norton	On going	<p>12/01/09 CenturyLink is not seeing a slow response time not are other users. Has your IT group had an opportunity to check for security or firewall issues that may be causing the slow down? CenturyLink does not have a "pop up". Mike was thinking this may be on your machines or part of Cox's internal security measures. If you find out more information on this, please let me know and I can re-address with Mike. 12/02/09 Cox is requesting that CenturyLink provide system requirements for running EASE. They are still experiencing long wait times when going from screen to screen. Cox is seeing this in all of their regions. Sent email to Mike Norton. 12/10/09 Cox is still seeing a slow response time. Tonya Woods was on the call and has they systems document. She will send to Teresa and Teresa will send to Cox. 12/11/09 document sent to Cox team. 12/14/09 The document that CTL provided really is not giving Cox what they need. It is too high level. Mike suggested doing a live meeting so that the CTL could observe the slow response time. This meeting is set for 12/17. 12/17/09 A live meeting was conducted with Cox and CTL. CTL did observe long wait times and instances of time outs occurring. CTL will now work with IT and review the sessions that were observed. 12/22/09 IT is looking at this. 1/5/10 CTL continues to make enhancements to EASE to lessen response time. Cox is seeing a slight improvement. Cox shared they are seeing time outs on large business customers. Mike N. stated that CTL was seeing that large business customers were being timed out. An edit was put in place to limit the # of lines that can be preordered to 200. If the business has more than 200 lines, then multiple orders will need to be placed and related 1/8/10 orders are processing quicker through EASE. CTL continues to make improvements that will increase performance. . Continued....see below</p>

## Cox Operational Issues Log - On Going

Issue #	Issue	Owner	Status	Remarks
3	<u>GUI slow response time (cont)</u>	Mike Norton	On going	<p>1/14/10 Cox is seeing an improvement in EASE performance. It still is not as fast as IRES was. They are still pulling the CSR from IRES due to EASE being so slow. CTL continues to make enhancements to EASE both by equipment and by design. More memory is being added to the servers next week. 1/19/10 Cox has seen some time out issues on 1/18 &amp; 1/19. This could have been due to the server issues. 1/22/10 CTL experienced performance issues earlier in the week related to memory condition. Additional memory has been ordered and is expected to be installed over the weekend. Basically doubling memory on all servers 1/27/10 due to technical issues, the memory was not installed last weekend. It will be installed the next weekend (1/30) 2/3/10 The memory upgrade is still on hold due to technical problems. CTL is working with the Vendor to resolve the issue. Tentative memory upgrade is for weekend of 2/6. 2/9/10 Memory upgrade went well over the weekend. Memory was doubled on all LSR servers. We also modified the indexing on the tables. 2/10/10 Cox is still seeing some slowness. 2/17/10 Cox at times will see some time outs and slowness. CTL continues to work on enhancements to ensure the reaction time is reasonable. The volume of orders in EASE has increased 30% - 40% and 97% of all Pons now flow through EASE. An Edit has been placed in EASE to not accept orders due dated after 2/27. Cox is concerned about orders over 200. Mike N. will check status on this issue. 2/24/10 Cox has seen more time outs. CTL has observed that some of the servers have been going down. Investigations are under way to determine the cause. Continued...see below</p>
3	<u>GUI slow response time (cont)</u>	Mike Norton	On going	<p>3/3/10 Improvements are ongoing. CTL suggested closing this issue. Cox requests some type of SLA. They still see load times anywhere from 20 to 60 seconds and overall the response is slower than IRES was. 3/10/10 No SLA for specific screens. For Pre-order and other responses, SLA is measurements already in place for LCUG. Cox Regulatory group is aware of those measures and CTL will work to ensure response times are in compliance with LCUG. 3/17/10 One more performance upgrade in test environment. After complete an internal audit will be done to determine if EASE is meeting performance measurements. 3/24/10 status same 3/29/10 CTL IT has identified a area of improvement in the preorder inquiry that can be re-engineered and improve response time. This issue is now being worked on. 3/31/10 CTL is working on the code to improve times for both LSRs and Preorder. 4/7/10 CTL continues to evaluate functions and make fixes where necessary. This will continue over the next year as system consolidations are completed in each market. Back Office Systems are also being reviewed. 4/15/10 IT continues to look at ways to enhance system. 10/21/10 Modifications in the front end was put in place the a week ago. CTL is seeing better response times. Cox confirmed that they too are seeing pre-order coming back quicker, but still not as quick as what IRES was.</p>

## Cox Operational Issues Log - On Going

Issue #	Issue	Owner	Status	Remarks
9	Customer or address validation information is spread out - too much white space	Tonya Woods	In progress (low Priority)	12/2/09 Cox's concern is that the information can not be viewed on 1 screen. They must page right or left, up or down to see the entire record. This combined with the slow response time is creating frustration for them. 12/14/09 CTL and Cox will be having a Live Meeting call on Thursday and will discuss this item. 12/17/09 a quick live call was held immediately after the group call. Tonya W. observed that a full page was not displaying and she did see the white space. She will put in a change request. However, she was not sure how quickly it could be completed. 12/22/09 Tonya is working on it. 1/4/10 ticket (E 367110-VFO) has been opened. 1/5/10 Vendor is still looking at this. 1/4/10 in progress. 1/19/10 in progress. 1/22/10 No response from Vendor yet. 1/27/10 Vendor presented Tonya with a bypass that she was not happy with. The vendor is working on a new solution. 2/4/10 Tonya reported that Cox can reduce white space by changing the resolution. Perhaps this will make screen easier to read. Tonya is still working with the vendor to see if when something more can be done. Cox will see if changing the resolution helps any. 2/09/10 Vendor continues to recommend modifying the resolution on the PC. We have moved this to a lower priority until other more important issues are resolved. We will continue to provide updates if we have them. 2/17/10 same. 2/24/10 same 3/3/10 same 3/10/10 same 3/17/10 same 3/24/10 same 3/31/10 same 4/7/10 same. 10/21/10 Project is ongoing. CTL is waiting on financial estimate. Reding address validation by end of year. Business logic will be improved to have address information in row format. Address will be pre-populated from pre-order information. There will also be radio buttons next to each row and will pre-populate into the order. 10/26/10 Enhancement is scheduled to be put in place sometime Jan 2011.
24	Directory Orders - Sup 1 & Sup 2	Mike Norton Tonya Woods	on going	1/14/10 Cox cannot sup any directory to cancel or change dd. 1/19/10 Mike N's team is investigating. 1/22/10 Cox requested that until this is fixed if Cox could send a list of cancels to CTL to cancel right away rather than wait for the auto cancel to occur. Mike N. said yes. Once CTL receives list, a scrub will be run. A meeting is scheduled for 1/25 to review policy. 1/27/10 Mike shared that a meeting was held to review policy and it was determined that the current policy of not allowing a change on a directory order would continue. Cox explained that in IRES they were able to sup to cancel a pon that had errored. Tonya will check to see if EASE could be enhanced to allow a CLEC to sup to cancel a pon that has errored and has not been clarified yet. 2/4/10 Tonya is still investigating. 2/10/10 Still looking at. 2/17/10 working on it. 2/24/10 As long as downstream portion has not been done, Cox will be able to cancel Pon. 3/1/10 Cox is unable to cancel any DL order in error or jeopardy status, they were able to do this in IRES and would like the same capability in EASE. 3/10/10 CTL is working on list or orders to cancel on Cox's behalf. An enhancement is being developed to allow Cox to cancel orders in jep & fatal reject status. No schedule yet. 3/17/10 Tonya will provide update next week. 3/24/10 Tonya was not on call. Teresa will get update from her. 4/7/10 CTL still looking at an approach. 04/30/10 Tonya was not able to be on the call. Mike Norton will get an update from her and send to Cox team next week. 5/14/10 Due to timing and the cost it would take to enhance SUDS for a fix on this issue, this issue will be corrected when NV is converted to Ensemble in Sept 2010. A fix in SUDS would not occur until 2011. 10/26/10 Tonya Woods is working on testing now.

Cox Operational Issues Log - On Going

Issue #	Issue	Owner	Status	Remarks
26	Inserting Main (LML) listings with Additional Listings (LAL)	Mike Norton	In progress	<p>1/19/10 when attempting to insert a main (LML) listing with additional listings (LAL), the PON completes but the preorder shows only the last LAL replicated with no main listing. After noticing this, Cox called the NEAC and were told that this was a known issue and that while there was no ETR, there was a work around of submitting each main listing and additional listing separately. Cox has taken action on all additional listings using the work around to ensure customer satisfaction so they can not provide examples. Cox submitted 7023951800IIG with a main listing and 6 additional listings all with separate Pons. Cox is requesting the same ability in EASE that they had in IRES. 1/22/10 Mike N. requested that a meeting be set up to fully discuss this issue. Meeting set up for 1/25. 1/25/10 Call was held with Cox and CTL. Due to Cox doing the work around, no examples were available. Cox will send a couple of Pons through not using the work around and provide the Pon #'s to CTL. Pons were sent through and Tonya W. agreed to investigate. 1/27/10 Tonya has been researching this issue but does not have an answer yet. She will provide an update next week if not before.</p> <p>2/4/10 Issue has been identified and a code fix will be deployed 2/13. The fix will be on orders going forward.</p> <p>02/17/10 Testing is being done on the fix. 2/24/10 Enhancement is scheduled for weekend of 2/27. .</p> <p>....continued see below</p>
26	Inserting Main (LML) listings with Additional Listings (LAL) (cont)	Mike Norton	In progress	<p>3/3/10 Due to issues encountered during testing, this enhancement has been rescheduled for 3/12. 3/17/10 Tonya will provide update next week. 3/24/10 Tonya was not on call. Teresa will get update from her. 3/31/10 The previous fix failed testing. IT is researching. 4/7/10 a new approach was coded and is in testing. Should know more by next week. 4/15/10 Testing on new approach failed. Tonya is researching other approaches.</p> <p>04/30/10 Tonya was not able to be on the call. Mike Norton will get an update from her and send to Cox team next week. 5/14/10 Due to timing and the cost it would take to enhance SUDS for a fix on this issue, this issue will be corrected when NV is converted to Ensemble in Sept 2010. A fix in SUDS would not occur until 2011.</p> <p>6/3/10 Cox questioned when KS and FL will be fixed/addressed. Teresa will check with the EASE team</p>